VIRGIL E. VICKERY ATTORNEY-CPA

9950 Cypresswood Drive, Suite 200 Houston, Texas 77070

Telephone 832-237-3226 Email: vickerylaw@sbcglobal.net Telecopier 713-513-5511

May 6, 2014

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street S.W. Washington DC 20554

Subject: GN Docket No. 12-268—Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions

Dear Ms. Dortch,

Mr. Paul Broyles, President of International Broadcasting Network ("IBN") has asked me to review the IBN filings in the above referenced matter. After my review and the review of the FCC website on this matter, I have reached the conclusion that the IBN position on this matter is correct. My fundamental concern in matters such as this is to avoid the concentration of such resources in large, multinational companies whose implied purpose is to warehouse such capacity to stifle competition.

Innovation more often comes from the small and nimble company who is driven by their vision. For example, Microsoft prospered where IBM failed. I can see from your website, that you are being inundated with comments. I will keep my comments short by saying that limited technological resources such as this must be carefully allocated to allow for innovation and technological advancement by all levels of participants, not just the concentrated few.

Respectfully submitted,

Virgil E. Vickery